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*Attorney for Petitioner Bernard Young

10 UNITED STATES DISTRICT COURT
11 DISTRICT OF NEVADA

12 Bernard Young,

13 Petitioner,

14 v.

15 Renee Baker, *et al.*,

16 Respondents.
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Case No. 2:18-cv-00110-RFB-VCF

**Unopposed Motion to Extend Time
to File Reply to Answer**

(First request)

1 **POINTS AND AUTHORITIES**

2 Petitioner Bernard Young respectfully moves for an extension of 62 days to file
3 his Reply to Respondents' Answer (ECF No. 47), up to and including Monday, April
4 19, 2021. Respondents, by Deputy Attorney General Geordan Goebel, do not object to
5 this request. Respondents' lack of objection to this request should not be construed as
6 a waiver to any procedural defense or argument.

7 On January 14, 2021, Respondents filed their Answer to Mr. Young's second
8 amended petition under 28 U.S.C. § 2254. (ECF No. 47.) Based on this Court's
9 scheduling order, Mr. Young's Reply is due on February 16, 2021. (ECF No. 22.)

10 Undersigned counsel respectfully submits that additional time is necessary to
11 properly prepare the Reply. The lead attorney on this case, Emma L. Smith, is on
12 parental leave until mid to late March 2021. This request for an extension of time is
13 to allow her to work on the Reply when she returns from leave. It is anticipated that
14 the Reply in this case will be one of her priorities when she returns from leave.

15 This motion is not filed for the purposes of delay, but in the interests of justice
16 and the interests of Mr. Young. Counsel respectfully asks this Court to grant
17 Mr. Young's request to extend the time for filing his Reply to Respondents' Answer
18 by 62 days, until Monday, April 19, 2021.

19 **IT IS SO ORDERED:**

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RICHARD F. BOULWARE, II
23 United States District Judge

24 DATED this 17th day of February, 2021.

1 Dated February 16, 2021.

2 Respectfully submitted,

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4 Rene L. Valladares
5 Federal Public Defender

6 /s/ Jonathan M. Kirshbaum
7 Jonathan M. Kirshbaum
8 Assistant Federal Public Defender

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10 IT IS SO ORDERED:

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13 United States District Judge

14 Dated: _____
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